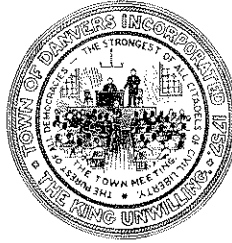


TOWN OF DANVERS

Wayne P. Marquis, Town Manager



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wmarquis@mail.danvers-ma.org

April 6, 2012

Kathleen Baskin, P.E.
Director of Water Policy
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, 9th Floor
Boston, MA 02114

Dear Ms. Baskin:

SUBJECT: Comments on Sustainable Water Management Framework

On behalf of the Town of Danvers, we are providing the following comments which detail the Town's objections to methodology used to create the Sustainable Water Management Initiative (SWMI).

The Town of Danvers expected that the Sustainable Water Management Initiative would develop a plan for integrated water resource management in the Commonwealth. This expectation has not been realized and the resulting framework focuses solely on further regulation of water supply through the water management act permitting process. We do not believe this framework addresses the real environmental challenges or opportunities faced in the Ipswich River Watershed Basin.

The Town of Danvers objects to the use of "baseline" withdrawals as part of the SWMI review thresholds. DEP's current baseline definition based on 2003-05 usage unfairly penalized suppliers such as Danvers that had implemented significant water conservation and demand reduction measures during this period. The DEP's approach to baseline rewards suppliers that had uncontrolled high demand during the 2003-05 period. There is no recognition for the Town-specific measures or conditions in the baseline methodology. If DEP does not consider such accommodations practical, then the entire baseline approach is inequitable and flawed and should be removed from the framework altogether.

We do support and are working closely with the Massachusetts Water Works Association in their efforts to properly develop the science behind this Initiative, and we realize there is a significant amount of work regarding validation of the science.

Once again, we must emphasize our objection to reducing and restricting water use in Danvers, thus inhibiting growth, while the Commonwealth of Massachusetts has increased water consumption in the Town through increased population at the Middleton Jail, permitting of over 700

Kathleen Baskin, P.E.

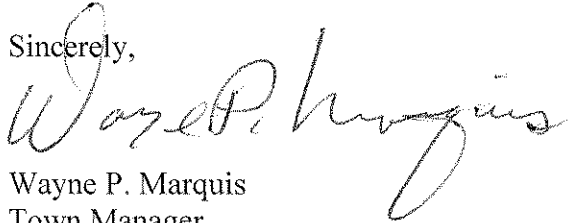
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residential units through the Chapter 40 B program, the expansion of North Shore Community College and, most recently, the approval of the new Essex Aggie/North Shore Regional Vocational School.

The Town of Danvers has continued to be a leader in the State in water conservation programs and comprehensive water resource management. The success of the Town's initiatives has been proven by many years of per capita water use and unaccounted water amounts far below regulatory standards. In addition, the Town partnered with Massachusetts Department of Environmental Protection in March, 2006 to develop a modified water withdrawal to further enhance water resource management. Despite these partnership efforts, the latest Sustainable Water Management Initiative seeks to further restrict and actually penalize the Town of Danvers.

Sincerely,



Wayne P. Marquis
Town Manager

cc: Senator Frederick Berry
Rep. Theodore Speliotis
Board of Selectmen
David B. Lane, Director of Public Works
Water & Sewer Commission